

1 Gregg Roberts
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Assignee of Record and Judgment Creditor, Pro Se

6 **UNITED STATES BANKRUPTCY COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**

8 In re Cammy Mendes,

Main Case #8:25-bk-11756-SC

9 Debtor

Chapter 7

10
11 Gregg Roberts,
12 Judgment Creditor/Plaintiff,

**DECLARATION OF CHARLES
CARUAL IN SUPPORT OF
OBJECTION**

13 v.

14 Cammy Mendes
15 Debtor/Defendant

16

17 1. I, the undersigned, am Charles Carual. I am over the age of 18 years, competent to
18 make this Declaration, and if called to do so would testify confidently about the
19 matters herein.

20 2. At all relevant times, I was one of the top executives at Carual, Inc. (“Carual”), a
21 California corporation.

22 3. Carual was the original judgment creditor in Orange County Superior Court Case
23 #30-2020-01149885-CU-BC-CJC (“the Judgment”), entered August 9, 2022. The
24 Judgment was assigned to Roberts by Carual, and Roberts filed the assignment in
state court on June 13, 2023.

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DECLARATION OF CHARLES CARUAL IN SUPPORT OF OBJECTION

- 1 4. On information and belief, the fact of the assignment was acknowledged in
- 2 Cammy's¹ Original Petition filed in the above-entitled case, DE #1, p. 70.
- 3 5. On information and belief, Defendant/Debtor Cammy Mendes ("Cammy") is a
- 4 100% shareholder and former owner-operator of 14th Century Playhouse, Inc., a
- 5 California corporation ("14th Century").
- 6 6. Cammy and her husband Ray told me that they formed 14th Century as a vehicle in
- 7 which to hold a franchise in a children's private party business, a franchise known
- 8 as "Pump It Up."
- 9 7. The specific Pump It Up franchise location purchased by 14th Century was located
- 10 at 11966 Jack Benny Dr, Rancho Cucamonga, CA 91739.
- 11 8. On or about August 21, 2018, the Caruals entered into an agreement to sell, from
- 12 their Corporation, all assets of the Rancho Cucamonga location of Pump It Up to
- 13 14th Century. A true and correct copy of the original Purchase and Sale Agreement,
- 14 is attached hereto as Exhibit 1.
- 15 9. The Purchase and Sale Agreement was amended November 15, 2018. A copy of
- 16 the Amendment is attached hereto as Exhibit 2.
- 17 10. As part of the transaction, Cammy personally guaranteed the payment obligations
- 18 of 14th Century. On information and belief, she acknowledged liability for the debt
- 19 in her Original Petition, DE #1, p. 28.
- 20 11. Cammy also facilitated the transaction, took part in business planning and
- 21 discussions, and was represented to be the party with the time and availability to
- 22 operate the acquired business.
- 23 12. In the alternative, on information and belief, 14th Century's Pump It Up business
- 24 generated revenue sufficient to make installment payments under the agreement,
- 25 but Cammy intentionally caused or allowed such payments to be withheld, with no
- 26 legitimate justification.
- 27 13. Cammy and Ray both promised that they would either get a second mortgage on
- 28 their house or sell their house in order to generate sufficient revenue and make all

¹ I will refer to the Debtor/Defendant by her first name "Cammy" and her husband by his first name "Ray," to distinguish them. No disrespect is intended thereby.

1 the remaining payments wtihn one year of the down payment. However, they paid
2 nothing but interest after the down payment.

3 14. On information and belief, Cammy has a criminal history including multiple
4 convictions, including at least one for forgery, for which she served time.

5 15. Ray, despite serving as a principal in a business that caters to children, had, on
6 information and belief, previously been convicted on two charges as a sex
offender.

7 16. If I had known about Cammy's criminal convictions, I would not have entered into
8 a business deal that required me to trust her to make payments.

9 17. If I had known about Ray's criminal convictions, I would not have authorized
10 selling to him a business that caters to children.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed this 3rd day of September, 2025 at WILDOMAR, California.

14
15 Charles Carual



26 DECLARATION OF CHARLES CARUAL IN SUPPORT OF OBJECTION

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
43430 E Florida Ave #F, Hemet CA 92544

A true and correct copy of the foregoing document entitled (specify): Reply in Support of Objection to Claimed Exemption in Real Property: Declaration of Charles Carual, Four Exhibits, and an unsigned copy of this proof of service per CCP 1013(b).

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 09/24/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor Counsel: Bert Briones, RED HILL LAW GROUP, 15615 Alton Parkway, Suite 210, Irvine CA 92618

Debtor: Cammy Mendes, 503 Traverse Dr, Costa Mesa CA 92806

Judge: Hon. Scott C. Clarkson, 411 West Fourth Street, Courtroom 5C, Santa Ana CA 92701

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/24/2025 James L. Munson II
Date Printed Name

Joe Munson II
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.